

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION

CIVIL ACTION NUMBER:

1:19-md-02875-RBK-KW

STATUS CONFERENCE
(Via telephone)

Thursday, April 1, 2021
Commencing at 3:00 p.m.

B E F O R E: SPECIAL MASTER,
THE HONORABLE THOMAS I. VANASKIE

A P P E A R A N C E S:

MAZIE SLATER KATZ & FREEMAN, LLC
BY: ADAM M. SLATER, ESQUIRE
103 Eisenhower Parkway
Roseland, New Jersey 07068
For the Plaintiffs

DUANE MORRIS LLP
BY: SETH A. GOLDBERG, ESQUIRE
30 S. 17th Street
Philadelphia, Pennsylvania 19103
For the Defendant, ZHP and the Joint Defense Group

Karen Friedlander, Official Court Reporter
friedlanderreporter@gmail.com
(856) 756-0160

Proceedings recorded by mechanical stenography;
transcript produced by computer-aided transcription.

1 (ALL PARTIES VIA TELEPHONE, April 1, 2021, 3:01 p.m.)

2 JUDGE VANASKIE: Go ahead, Mr. Goldberg. Now, I've
3 read the letters, I've read excerpts of the depositions. I
4 haven't read the deposition, the rough transcript in their
5 entirety. I read the parts that were referenced by counsel.

6 I want to give you an opportunity to be heard, but
7 we're not going to take a whole lot of time on this today.
8 I'll let you know that right now.

9 So, Mr. Goldberg, please proceed.

10 MR. GOLDBERG: Thank you, Your Honor. We raised two
11 issues in our letter. The first is Mr. Slater's conduct at
12 the depositions of the ZHP party witnesses, and the second is
13 the issue of document translation.

14 On the first issue, Your Honor, I think it's
15 important for Your Honor to understand the setting that we are
16 in, which is so unique for a case; probably something that's
17 never really happened in the U.S. courts before. We have --
18 we have Chinese witnesses who are being deposed by Zoom and
19 because they require to quarantine, they're actually doing
20 these depositions alone from their hotel rooms. Okay?

21 So this is -- this is even more unique than just a
22 Zoom deposition --

23 JUDGE VANASKIE: Yeah.

24 MR. GOLDBERG: -- because counsel -- ZHP's counsel is
25 not present with the witnesses, they are in their hotel rooms.

1 Your Honor may not be aware. There is nothing akin
2 to a deposition under Chinese law. The witnesses, like
3 Mr. Dong, who has been testify -- I'm sorry, Mr. Pong (sic),
4 who's been testifying over the last four nights. The
5 witnesses, like Mr. Pong, who are Chinese nationals, they have
6 no experience with U.S. litigation. Their only understanding
7 of what U.S. litigation is comes from the movies.

8 We've tried to explain this, the process to them,
9 we've tried to explain the adversarial nature to them, but
10 they are really coming at this having no frame of reference
11 except what they see in the movies.

12 Rather than be sensitive to this very unique
13 situation, where you have a witness who doesn't speak the same
14 language, who has no experience with U.S. litigation, who's
15 never been deposed before, who's sitting alone in a hotel room
16 without their counsel present, rather than have any
17 sensitivity to those issues, Mr. Slater is going over the top
18 with respect to his unprofessional conduct.

19 He has impugned the credibility of Mr. Pong numerous
20 times without any basis. He's asserting that Mr. Pong is
21 answering questions in an evasive way without taking into
22 consideration that Mr. Pong may not really understand what is
23 going on and how to answer questions that are so ill formed
24 that there's no way even the most experienced witness could
25 answer properly, or answer with a -- an answer that is

1 satisfactory to Mr. Slater.

2 You know, it's telling that Mr. Slater's colleague,
3 Ms. Hilton, had a deposition for five nights with Minli Zhang
4 last week, and we didn't have to contact Your Honor once. But
5 as soon as Mr. Slater started to depose Mr. Pong, Your Honor
6 may recall that that first night, at 2 in the morning, Your
7 Honor received a letter from plaintiffs about the first day of
8 testimony.

9 We are not going to be able to get through these
10 depositions if Mr. Slater is permitted to continued to take
11 them. We would ask, because of his unprofessional conduct,
12 that he be precluded from taking depositions.

13 And I've given you a few good examples, but there are
14 more, but they're telling a witness, who Mr. Slater knows has
15 a one-month-old baby at home, that we will stay here until
16 3:00 a.m. if you want -- if you insist on having a document
17 translated, they'll stay here until 3:00 a.m., that you're the
18 one trying to get out of Macau.

19 You know, these kinds of statements, "you're the one
20 trying to get out of Macau," or "we'll stay here until
21 3:00 a.m." these kind of statements are intended to intimidate
22 the witness. They're intended to make the witness feel as if
23 he's doing something wrong by wanting to clarify what a
24 document says; that he's doing something wrong if he takes his
25 time to answer a question.

1 This kind of witness intimidation is altering the
2 testimony, it's prejudicing the ZHP parties, and quite
3 frankly, it is so insensitive to the witness, and it should be
4 stopped.

5 If Mr. Slater is not precluded from taking the
6 depositions, then this kind of conduct should be stopped by
7 way of an explicit order. Then Mr. Slater should ask a
8 question, he should accept the answer, and he should move on
9 to the next question without the editorial comments that are
10 intended, intended to make the witness feel as if the witness
11 has done something wrong.

12 JUDGE VANASKIE: All right. Let me hear from
13 Mr. Slater. Let's take this issue up first.

14 MR. GOLDBERG: Sure.

15 MR. SLATER: Thank you, Your Honor.

16 I think that my best response to this is what I put
17 in that letter today, which is that I think that the
18 transcript speaks for itself, and I think that the video would
19 even speak more.

20 I am very confident that I haven't done anything
21 inappropriate. I took to heart what Your Honor told us on
22 Monday. I haven't made a motion to strike since. I've
23 stopped my entire practice of 25 years of doing this. I've
24 taken it and moved on.

25 I've not impugned the witness in any way.

1 Counsel points to one example or two examples of
2 things where I'm literally begging the defense lawyer to
3 please intervene and talk to their client, encourage their
4 client to answer in a more direct way and to try to avoid all
5 this delay because it affects everybody.

6 And I didn't say we're going to stay until 3:00 a.m.,
7 I said we're not going to continue the deposition until
8 3:00 a.m. because the translator can only go so long, the
9 court reporter can only go so long, the videographer can only
10 go so long. The lawyers are the least important in that
11 equation, but I said, we're not going to go until 3:00 a.m.

12 And I didn't say "you want to leave Macau" in a
13 threatening way. I was repeating what counsel said on Monday,
14 which is he has a limited work visa. And I was basically
15 trying to remind him that if he asks to have sections of a
16 document translated to him, it's absolutely his right, I have
17 never once said not to do it, but I was just trying to remind
18 everybody, if you do this for a half an hour, or you do this
19 for 20 minutes, then it's going to push the deposition to the
20 next day and the next day, which I know that the defense wants
21 to avoid.

22 So it was not in any way a threat.

23 And I will say the same thing is happening, frankly,
24 with the Chinese-language documents, so it's not really any
25 easier with them.

1 As far I know the overall layout, everybody is doing
2 the best they can. I don't think this is such a complex
3 process as it's being made out to be. Most witnesses in
4 federal litigation of this nature have never been through
5 this, including witnesses who are, you know, executives or
6 employees at pharmaceutical companies in the U.S., they've
7 never been in a situation like this. It's new to everybody.

8 And this is not just a fact witness. This is a
9 designated corporate representative who they chose to put up
10 on a topic that may be among the two or three most important
11 things in the ZHP part of the litigation, which is their
12 evaluation of the impurity profiles and avoiding impurities --

13 JUDGE VANASKIE: Hold on. You broke up there.

14 (Reporter asks counsel to repeat.)

15 JUDGE VANASKIE: Somebody must have a window open or
16 something. A window open and it's breezy out there.

17 MR. SLATER: And avoid having impurities in the
18 product, which is the risk assessment process, which is the
19 core of this case.

20 And they designated this witness. He's not a fact
21 witness. He is the designated corporate representative, and
22 we, obviously, all understand that when you designate
23 somebody, it needs to be somebody who is capable of educating
24 themselves, knowing the topics and handling that, and he's
25 testifying behalf of the company, not behalf of himself.

1 So, you know, there's obviously obligations. Again,
2 I stand by the transcript, Your Honor. I stand by -- I really
3 encourage, if they want to push this, because nobody likes to
4 have these types of claims made against them, as an attorney,
5 but the video, with the transcript, where Your Honor can
6 actually hear the tone of voice, I'm inviting that. I'm
7 asking for that.

8 I have no problem that if they want to say -- if they
9 want to say these things about me because I'm very comfortable
10 that what I'm doing is entirely appropriate and dealing with a
11 very, very difficult witness on very, very important areas
12 where I am cutting out massive sections of my outline. I'm
13 not asking about entire documents or parts of documents,
14 because if I do what they're saying and we're following your
15 rules, Your Honor, there's no motion to strike, I ask a few
16 times, I move on. But you saw what we provided you.

17 The first question in the deposition, which is not an
18 unfair question, which is not complex, I spent over 20 minutes
19 on one question and then had to move on.

20 So I'm doing the best I can, so -- I'm sorry.

21 So you understand what I'm saying. I mean, if
22 there's anything that you're concerned about, obviously I take
23 that very seriously, but I think the transcript doesn't show
24 me doing anything inappropriate.

25 And they keep citing to Ms. Hilton, she asked for me

1 relief than I did, about the looking at the screen. She
2 actually told the witness to turn off all the other
3 applications in case they were looking at something. I didn't
4 even go that far.

5 So that's just a standard kind of question, and the
6 person they're putting up as the exemplary questioner asked
7 even more on that topic.

8 So I don't want to -- I don't want to --

9 JUDGE VANASKIE: Yeah, let me interrupt now
10 because -- go ahead. I'll give you a brief response, Mr.
11 Goldberg.

12 MR. GOLDBERG: Your Honor, I think, and we've
13 included the language in our letter. And the fact that
14 Mr. Slater tells you he thinks he's doing okay and he stands
15 on the record, that's fine. That doesn't mean he's not being
16 abusive and bullying and intimidating.

17 And when you have a witness who says, and here are
18 his words, "I deem this as a personal attack on me," it is
19 clear that whatever Mr. Slater is doing is not fair to the
20 witness, and the witness is feeling attacked by the
21 questioning.

22 This has been going on for four nights. When
23 Mr. Slater says to the witness, "Were you told it's acceptable
24 to take as long as you possibly can and give the longest
25 possible answer every single time in order to take up the time

1 in our deposition," he is trying to force the witness, to
2 alter the witness's testimony, to somehow shorten the
3 witness's answers, or answer in a way that's intended to
4 satisfy Mr. Slater, not intended to provide the testimony the
5 witness needs to provide.

6 Those kinds of comments are completely unacceptable,
7 they're inappropriate, and the Court should order Mr. Slater,
8 if you're not going to order that he's precluded, that he
9 should refrain from those kinds of editorial comments that are
10 intended to make the witness feel as if the witness has done
11 something wrong and to intimidate the witness into answering a
12 certain way.

13 JUDGE VANASKIE: All right. Thank you, Mr. Goldberg.
14 I've read significant parts of the transcript, and I
15 have the benefit of this having been presented to me earlier
16 this week.

17 First, I'm not going to preclude Mr. Slater from
18 being the person on the plaintiffs' side taking this
19 deposition or any other deposition. I don't think that's
20 appropriate, certainly not at this point in time.

21 And I would say this, as well, about the witness.
22 The witness, at times, is simply refusing to answer the
23 question. At times. Not all the time. And, unfortunately,
24 Mr. Slater has the tendency to be the bulldog and not give up
25 when it's apparent that he's not going to answer the question,

1 other than saying, words to the effect, that based upon the
2 state of the knowledge in 2011, we complied with everything we
3 were supposed to comply with.

4 That paraphrase on my part. But that's a refrain
5 that I see repeated throughout the answers to the questions
6 that is not responsive. I'll say that.

7 On the other hand, I will say, Mr. Slater, and this
8 is probably your personality, when I read parts of this
9 transcript, it brought to mind a word my mom had used that I
10 hadn't heard, God rest her soul, I haven't heard in a long
11 time, and that's the word, "snide"; that some of the comments
12 are snide comments.

13 You mentioned the fact that the first question took
14 20 minutes. And at the end of that 20 minutes, you couldn't
15 help yourself but say, "That took 20 minutes; we're cruising."
16 That kind of commentary needs to stop. It doesn't advance the
17 matter at all. It may be sending a message to the witness to
18 hurry things up, to give shorter answers.

19 I am cautioning you, with the penalty of sanctions in
20 the future, if you can't avoid those editorial comments.
21 They're not appropriate, they're not professional, they don't
22 need to be made. They can be entertaining, but nobody is
23 there to be entertained. It is a very, very serious matter.

24 And so I -- as I said, I'm not precluding you from
25 taking the deposition, but I'm going to ask you that when

1 something like that pops into your head, bite your tongue.

2 There's no need for it, and there's no call for it.

3 MR. SLATER: Thank you for the guidance, Your Honor,
4 and I will, of course, do what Your Honor directs me.

5 JUDGE VANASKIE: Now, let's talk about translation --
6 or having English version -- or Mandarin versions of documents
7 that are in English.

8 Mr. Goldberg?

9 MR. GOLDBERG: Thank you, Your Honor.

10 This came up on Monday, and I just want to put this
11 into the right context because Mr. Slater referred to this
12 issue having been decided by Judge Schneider, and it wasn't
13 decided by Judge Schneider. In fact, Judge Schneider
14 explicitly acknowledged that we would be here today on this
15 issue.

16 And what was decided previously was whether
17 Mr. Slater would have to disclose, in advance of the
18 deposition to defense counsel, translated versions of the
19 documents that he would use as exhibits, and he raised the
20 concern with Judge Schneider that he did not want to disclose
21 his work product. And that's what Judge Schneider ruled on.

22 He ruled that at this point, I am not going to put
23 into the protocol a provision that requires the parties to
24 exchange exhibits before the deposition because I don't think
25 plaintiffs' counsel should have to disclose their work

1 product.

2 But he did not decide what happens during the
3 deposition in terms of who bears the burden of translating the
4 documents for the witness, and when does that happen.

5 He only decided, there shouldn't be a predeposition
6 exchange of the exhibits.

7 Now, when we are in the depositions, what's happening
8 is Mr. Slater wants to introduce a document that is written in
9 English, maybe part of it's in Chinese -- in Mandarin, too,
10 but he wants to question the witness on an English portion of
11 the document. And he is insisting that the interpreter of
12 record do what's called "sight translation," translate the
13 document on sight.

14 And, you know, this is -- what he's asking the
15 interpreter to do is to take a specific sentence or a specific
16 paragraph in an entire document written in English, or an
17 entire section written in English, sight translate it, and
18 then have the witness answer a question based on that sight
19 translation.

20 This is so ripe for error that it's unquestionably
21 prejudicial to the ZHP parties.

22 First of all, the interpreters that have been
23 retained, at least by the ZHP parties, we did not retain them
24 on the basis that they were going to be sight translating
25 documents. Of course they can do it, but to sight translate

1 highly technical terms, like we are using in process chemistry
2 on the spot is challenging, and accuracy is an issue.
3 Accuracy is an issue when you're translating the spoken word,
4 which is why both parties have what are called "check
5 interpreters."

6 But not only is the accuracy a problem, the witness
7 has no way of knowing if the translation is accurate because
8 the witness can't read the document. So the witness has to
9 rely on the interpreter's site translation. Okay?

10 The other thing the witness can't do is the witness
11 can't look at the other pages of the document to understand
12 what the document is, whether there's any context for the
13 plucked-out sentence that Mr. Slater is focused on; and that's
14 what witnesses have the right to do.

15 They have the right to look at a document that they
16 are being asked about, to determine what the document is, what
17 the context for the document is.

18 So not only do we have a concern about the accuracy
19 of the translation, the accuracy of the sight translation, we
20 have the second concern, which is that the witness is being
21 forced to answer a question about a document with no context
22 for the language he is being asked about.

23 And there's a problem --

24 JUDGE VANASKIE: Go ahead.

25 MR. GOLDBERG: So, you know, we -- in out -- a third

1 problem --

2 JUDGE VANASKIE: I'm sorry. Finish your thought.

3 MR. GOLDBERG: Yeah. I mean, a third problem here
4 is, you know, plaintiffs are asking the interpreter of record,
5 who ZHP has retained, to spend the time to interpret these
6 documents during the deposition. So ZHP is now paying for
7 something that the plaintiffs want to do in the deposition.

8 These are their depositions. These are the documents
9 they want to show the witness. They have had these documents,
10 many of them, back since 2019 when we produced core discovery,
11 but certainly since November when we produced the documents.
12 They've had plenty of time to translate the key documents that
13 they want to use.

14 You know, it's one thing to -- maybe a short e-mail,
15 you know, maybe the interpreter of record to translate
16 something quick like that, but a technical document, you know,
17 it is asking too much of the interpreter of record.

18 There is no reason plaintiffs can't have their
19 interpreter -- they have a check interpreter there. There's
20 no reason they can't have their interpreter interpret the
21 documents before the deposition. Even a machine-translated
22 document would be better than no translation because it would
23 allow the witness at least to get some flavor of what the
24 document is.

25 JUDGE VANASKIE: I wanted to ask a question about

1 that, about machine translation.

2 What is available out there in the marketplace to do
3 machine translation from English to Mandarin? How accurate is
4 it? Are there ratings of these products so you can tell what
5 is a good product? Things like that. And what's the expense?

6 Do you have any --

7 MR. GOLDBERG: Your Honor, I don't have that
8 information off the top of my head. I know we've discussed it
9 with plaintiffs. It is very affordable to do machine
10 translation. We can get you that information, but it is not a
11 significant cost.

12 Again, the accuracy of it, at least for these
13 purposes, a machine-translated document at least could aid in
14 the efficiency of these depositions. But from our
15 understanding, it costs, you know, a few cents per page, and
16 so it should not be a significant cost burden for plaintiffs
17 to have the documents machine translated in advance of the
18 deposition.

19 And mind you, Your Honor, not all of the ZHP party
20 witnesses need this, need to be presented with Mandarin
21 written documents. The witnesses next week, my understanding,
22 can read English. So we're talking about a small handful
23 of -- we're talking about a small handful of ZHP-party
24 witnesses who need to have a document translated into Mandarin
25 for their deposition.

1 JUDGE VANASKIE: All right. Let's hear from
2 Mr. Slater now.

3 MR. SLATER: I'll start at the end, Your Honor, and
4 give you an answer to your question.

5 JUDGE VANASKIE: Okay.

6 MR. SLATER: Machine translation is not adequate for
7 this, and I'll tell you why.

8 What you'll get is a foundation objection to every
9 single question, and to the use of a machine-translated
10 document.

11 We, and I'm sure the defense as well, use machine
12 translation sometimes, when there's a massive number of
13 documents to go through, just to get a few words out to see
14 what the subject matter is, and then we can decide, do we want
15 somebody else to look at it and give us more fulsome
16 information about the document.

17 It's not accurate. There's all sorts of errors. It
18 doesn't read handwriting, handwritten documents. Scanned
19 documents cannot be cleanly machine translated at all. And
20 there's a lot of scanned documents in the production.

21 So that's a recipe for foundation objections up and
22 down the board. And what would happen is, we would provide
23 the machine translation, their checker would look at it -- and
24 they have a checker, too, I believe -- they would look at it
25 and say, that's not accurate, and then we would spend 45

1 minutes arguing over the translation.

2 This is much ado about nothing.

3 Your Honor saw the excerpt where I actually was, you
4 know -- where I was responding and I give the full excerpt
5 citation to Your Honor for one of the examples they gave us.

6 JUDGE VANASKIE: Right.

7 MR. SLATER: As -- you know, first of all, this was
8 obviously argued fully on Monday and I think it was ruled on.
9 But obviously it's raised again, I'll address it.

10 I want to address a couple of the issues. I'm sorry
11 if I'm a little scattered, Judge. I'm candidly very tired.

12 JUDGE VANASKIE: I understand. Sure.

13 MR. SLATER: Yeah. So if I'm not speaking as clearly
14 as I might hope I am, I'm just being honest, I'm just tired.

15 Number one, they chose, ZHP chose who to appoint as
16 their 30(b)(6) witness. They have the absolute right to
17 appoint somebody, but there's rules that say you have to
18 appoint someone who can be an adequate 30(b)(6) rep.

19 They did this knowing that a lot of documents that
20 are crucial to this topic are in English, and, for example,
21 are submissions to the FDA where they address parts of the
22 risk assessment. And they chose to appoint somebody as their
23 30(b)(6) who could not read those documents.

24 I think that the testimony shows that what I've done
25 with that is not try to fool the witness or anything. I've

1 picked out specific areas. There is a lawyer defending the
2 deposition who can look at my reading of the language, and if
3 I miss a word, which I did, actually, earlier in the
4 deposition, counsel said I left out a word. I stopped, I went
5 back and reasked the question. I said, you're right. When I
6 was reading that sentence, I missed it. So that it was
7 accurate.

8 There's no difference between that and me asking the
9 question without the document. All I'm doing is putting the
10 document into the record as an exhibit so that when we get to
11 the point of trial, the document we worked with is an exhibit
12 and all counsel that are attending the deposition can see the
13 document.

14 And then what I'm doing is I ask about -- I confirm
15 what the language says, and then I ask a question about that.
16 Most of the questions were -- that was known to ZHP and their
17 basic foundational question.

18 So there's nothing where there's anything unfair.
19 We're not -- so going to the next issue. There is not one
20 time where I have forced the witness to have something
21 translated by the translator that they brought to the
22 deposition.

23 Rather, the defense said that they would like their
24 translator to be able to translate. And the fact that they're
25 saying the witness doesn't trust the translation of the

1 English language, whether I -- what I was if I was just
2 reading from the document without using the document? I could
3 do the same thing, but I'm supposed to establish a record of
4 where I'm getting the information from.

5 The witness is still going to have to trust the
6 transition by his translator which was retained by ZHP. So
7 they've chosen -- and I haven't objected to it, ever.

8 So the time it's going to take is going to happen
9 anyway. Your Honor understands our sensitivity to this issue
10 because you see the amount of time it's taking to get an
11 answer to a question and how long the answers are.

12 So, you know, for all those reasons, there's
13 absolutely no call for us to do a translation of these
14 documents. They're lengthy, they're extensive, and I don't
15 think there's any example that counsel can point to where
16 there was some unfair use of the document.

17 Again, as I said on Monday, not in a derisive way
18 towards anybody who speaks or reads a foreign language, but as
19 a matter of trying to comply with the rules and a matter of
20 practical reality, I suggested maybe they can appoint a second
21 witness who might be able to more easily address the English
22 language documents that fall within this topic if they're
23 concerned about that.

24 So, you know, for all those reasons, we ask that the
25 ruling that Judge Schneider made stand. There's no order that

1 we translate the documents. It would be a big burden.
2 There's going to be arguments when we get to deposition of how
3 much should have been translated, whether the translation is
4 accurate. All it's going to do is spur more litigation and
5 argument.

6 MR. GOLDBERG: Your Honor, this is Seth Goldberg.

7 JUDGE VANASKIE: Yes, go ahead.

8 MR. GOLDBERG: May I?

9 JUDGE VANASKIE: Yes. Sure, Mr. Goldberg.

10 MR. GOLDBERG: Your Honor -- Your Honor, the first
11 thing to address is Mr. Slater's comment is discriminatory --
12 and I hate to say it, but it is -- it is discrimination.

13 For Mr. Slater to say that a witness would only be
14 adequate if they spoke English -- and that's what he said. He
15 said, they should have provided witnesses, a 30(b)(6) witness
16 who would have been adequate would be somebody who spoke
17 English. And that is the kind of discriminatory comment that
18 needs to be addressed.

19 This Court should not endorse the view that a witness
20 is not adequate because they do not speak English. We
21 designated the witnesses who have the most knowledge on the
22 topics in the 30(b)(6) notice, and that is regardless of
23 origin, it's regardless of language, it's regardless of race
24 or sex, it is what the witness knows about topics. That's it.

25 And to say that a witness would be more adequate if

1 they spoke English, or that only an adequate -- only an
2 English-speaking witness would be adequate is a discriminatory
3 comment, and the Court should take it very seriously.

4 In terms of the time, again, Judge Schneider only
5 ruled on the predeposition exchange of documents to not reveal
6 attorney work product. He left open for today how the time
7 and cost of the translation should be allocated.

8 These witnesses have traveled to another country.
9 They are on a time-limited visa. They have been allocated per
10 agreement by the parties with five hours of testimony a night.
11 We have retained interpreters on the basis of five hours of
12 testimony per night. We have given the witnesses and the
13 interpreters a few breaks during that five hours, so we are
14 actually going to roughly six hours every night.

15 If plaintiffs insist on not interpreting English
16 documents into Mandarin, for Mandarin-speaking witnesses who
17 cannot read English, then plaintiffs should bear the cost, and
18 the time should be allocated against plaintiffs. Or else we
19 are going to run past the witness's visa, we're going to run
20 past the number of nights of testimony that the parties have
21 allocated, and that is extremely unfair to these witnesses who
22 have -- who have sacrificed their time during this pandemic to
23 travel.

24 Plaintiffs have made no showing why they cannot
25 translate these documents. Yes, they can use machine

1 translation, they can retain human translators, as we have all
2 done, and this is a burden that they should have to bear at
3 this stage in the game.

4 Now, maybe the ship has sailed for tonight's
5 testimony of Peng Dong. We're not expecting it. Next week
6 the two witnesses do not need translation. But for witnesses
7 following next week's depositions, there is plenty of time for
8 plaintiffs to translate the documents so that the
9 Mandarin-speaking witnesses can testify about the documents
10 fairly and without prejudice.

11 JUDGE VANASKIE: All right. Thank you.

12 MR. SLATER: Do I need to respond to what was just
13 said about me, Your Honor, or not? I'll do whatever you guide
14 me to --

15 JUDGE VANASKIE: I understood the point you were
16 making, and I didn't take it in the same vein, although
17 Mr. Goldberg's point is well taken as well.

18 They have the right to designate the person who's
19 most knowledgeable. They don't have an obligation to
20 designate somebody who speaks English or reads English, and so
21 I see no problem. I would not expect them to designate two
22 people, one who's got a familiarity with the English language
23 and one who may not.

24 So I don't expect that at all.

25 And I am sensitive to the fact that a witness who is

1 asked about a document and is unable to read it because it's
2 not in a language they understand.

3 I need to know a little bit more about the cost of
4 translating these documents. I agree with Mr. Goldberg, that
5 this issue was not definitively resolved once and for all by
6 Judge Schneider. It was not resolved by me, by the way,
7 Monday or whatever day it was that we had our conversation on
8 this particular matter.

9 I think it would be preferable if the documents were
10 translated. That's why I asked about machine translation.

11 I hear your concern, Mr. Slater, about the foundation
12 objections that you'd likely to run into. Or if you don't run
13 into them at the time you present it, it's going to come up
14 later when somebody questions the machine translation.

15 But I think going forward, I want to have a proper
16 foundation for making a determination about the burden that
17 would be involved in having documents put in the Mandarin
18 language, when the witness, who is going to be questioned, has
19 no familiarity with the English language, is not bilingual.

20 I think that's a matter of fairness. And I think
21 that needs to be accomplished going forward, but I don't want
22 to impose an undue burden.

23 So what I expect to receive, is from both sides, some
24 submission that would provide to me, and you can do it on a
25 per-page basis, for example, what it could cost to take

1 English and put it in Mandarin; and then from the plaintiffs'
2 perspective, some ballpark estimate of the number of pages
3 we're talking about.

4 I realize some of these documents may be hundreds of
5 pages long and the witness may only be questioned on a page or
6 two. And I would expect that in good faith, cooperative
7 counsel would be able to work together, that you wouldn't need
8 to translate that hundred-plus page document; you'd only need
9 to get the relevant part and the context for the relevant
10 part.

11 And I know that's putting a burden on you, but this
12 is the consequence of our world economy and taking depositions
13 of people the way -- especially the way we're taking them now,
14 having to use this remote technology.

15 So I know it's too late for tonight, obviously, and
16 Mr. Goldberg has represented that it's going to be at least a
17 week or so before you take another deposition of a
18 Chinese-speaking witness. But hopefully by next Wednesday,
19 I've scheduled a conference call for next Wednesday, that you
20 all can give me -- both sides can give me some indication --
21 and I don't mean to limit this, so please pass this on,
22 Mr. Goldberg, to the rest of the defense team. I don't mean
23 to limit this to Mandarin, I don't mean to limit this to the
24 defendants who are located in China. It may apply to those
25 located elsewhere.

1 I would like to get some understanding of what kind
2 of expense we're looking at to put these documents into the
3 language of the deponent so that the deponent can have some
4 sense of assurance that what they're seeing they understand.

5 And so I'll look for a report. And if you put it in
6 writing, great; if not, we'll get a verbal report next
7 Wednesday.

8 Is there anything else we need to address today?

9 MR. SLATER: Your Honor, I just want to be clear on
10 what you said.

11 Your Honor is going to need, if I understand
12 correctly, to hear more fulsome arguments on this issue
13 because, for example, we used an IARC monograph last night,
14 which is the International Association Research on Cancer.
15 It's an important association.

16 JUDGE VANASKIE: Yes.

17 MR. SLATER: In any event, I used that monograph, a
18 couple of isolated sentences within it, which specifically
19 impeach things about the availability of knowledge about
20 certain scientific matters.

21 The book is hundred -- or hundreds of pages long. I
22 used excerpts of a couple of sentences. So it's not feasible
23 for us -- some of these documents are hundreds of pages long
24 or much longer and I'm only using parts. So I'm -- I guess
25 maybe I'm just previewing and I have a little bit of concern.

1 But as long as I understand that this is not a
2 decided matter and we still have an ability to argue it, then
3 I don't have to say much more today.

4 JUDGE VANASKIE: It's not a decided matter, but I do
5 want to make clear that when you're talking about a monograph
6 like that that's hundreds of pages long, I'm not suggesting
7 that the entire monograph has to be in Mandarin, but I may say
8 that you'd have to provide the page and two or three pages
9 beforehand.

10 I know that's arbitrary. I understand that. But
11 it's something that at least it would provide greater context
12 than seeing one paragraph and asking somebody to answer a
13 question on that one paragraph when what precedes or follows
14 it may put that stark assertion in a better light for one side
15 or the other and puts it in context.

16 MR. SLATER: I guess we'll need a record. Because I
17 can -- I can -- I think when we talk about this next week,
18 it's going to be important to go through it with some concrete
19 examples.

20 Again, they're going to have counsel there who can
21 look at the rest of it, and if you do instruct us to translate
22 the portion we want to question on, you know, two or
23 three pages of that monograph, you're talking about very small
24 type, you're talking about a lot of irrelevant things. You
25 know, it may be that we're going to ask you at this point, if

1 we have to translate any part, that it's up to them at that
2 point. They're going to have their own counsel to look at it.
3 If they want -- so I'm just -- I'm just kind of pointing out
4 there's a lot of --

5 JUDGE VANASKIE: We will have an open mind with
6 respect to this.

7 Go ahead, Mr. Goldberg.

8 MR. SLATER: Thank you. That's all I was asking,
9 Your Honor, thank you.

10 MR. GOLDBERG: You know, we're have going to have the
11 deposition a week later of a gentleman named Qiangming Li.
12 And I can assure you that his ability to read English is like
13 Mr. Pong's. He's going to be presented with a number of
14 highly technical documents based on his role at ZHP. And I
15 don't see why plaintiffs are not going to take the time now to
16 start to translate the documents that they know they're going
17 to want to use with Mr. Li.

18 Following Mr. Li will be another witness that they
19 know, they know the documents they're going to want to use
20 with him, or at least a good portion of them, and there's no
21 reason they can't start to translate those documents.

22 And I guarantee you that they have spent time and
23 money to date translating some documents. There is no way
24 that they've gone this long in this case without having
25 interpreters or translators or some service or firm that's

1 doing that.

2 And you can ask Mr. Slater if he has been using a
3 translator at all during this litigation because I would
4 expect they have. And there's no reason those documents can't
5 be starting -- they can't start to translate those documents.

6 Your Honor, if we have to move to stay these
7 depositions because of unfairness, because the Chinese
8 witnesses are being treated in an unfair way because of their
9 language, we will do that. It is -- we cannot hold the
10 Chinese witnesses to a different standard simply because of
11 the language they speak.

12 The plaintiffs have chosen to sue this company,
13 they've chosen to enter into this litigation. You heard
14 Judge Kugler say yesterday that each side needed to be
15 prepared to have an army of resources. Plaintiffs have war
16 chests to pay for the cost of translation, and they should be
17 asked to start to do that now. And there's simply no reason
18 they cannot start to do it now.

19 JUDGE VANASKIE: Mr. Slater?

20 MR. SLATER: I assume that we'll do what Your Honor
21 told us. We'll file our position papers and discuss this next
22 Wednesday. We obviously have a significant disagreement. We
23 obviously have different viewpoints on this. We'll have to
24 present this to Your Honor, and I -- you know, we'll follow
25 what Your Honor told us to prepare to discuss this in detail

1 next Wednesday.

2 And I think we'll be able to make a very compelling
3 presentation that the sky is not falling, that we're not being
4 unfair, and that I don't think it's necessary. And if Your
5 Honor disagrees, I expect that we'll be able to -- or hope
6 that we'll be able to persuade Your Honor that our obligations
7 should be much narrower than what is being suggested by
8 defense counsel and still be very fair to the witnesses as we
9 have been throughout.

10 JUDGE VANASKIE: All right. I think I've heard
11 enough today on this particular issue, and we'll leave this
12 for next Wednesday.

13 I will conclude with this, saying that I am extremely
14 sensitive to a witness who doesn't speak English being asked
15 questions about documents that are only in English, that the
16 witness doesn't have an opportunity to review. I mean, it's a
17 pretty much standard practice when you're dealing with a
18 single language to give the witness an opportunity to review
19 the document. That opportunity is not being afforded here
20 under these circumstances.

21 So I just want you to know that I am sensitive to the
22 arguments that are being presented here on both sides, but I
23 do think there needs to be a way to make sure that these
24 witnesses are being, essentially, in the equivalent position
25 of they spoke the language in which the document they're being

1 questioned on is written.

2 So we'll talk about this again next Wednesday. I
3 know you've both got so much to do. I don't mean to put more
4 on you, but I need an adequate foundation to make a decision
5 that was just brought up, to me at least, this week, in terms
6 of what language the documents have to be in.

7 All right. Is there anything else then today?

8 MR. SLATER: Nothing for plaintiffs, Your Honor.

9 JUDGE VANASKIE: All right. Mr. Goldberg?

10 MR. GOLDBERG: Your Honor, you know, at the risk of
11 aggravating Your Honor, I do think Mr. Slater owes Your Honor
12 an answer to the question, whether the plaintiffs have already
13 secured interpreters and can begin to translate these
14 documents. Because this case has been going on for two years,
15 and I suspect that they have and that they can begin to do it.

16 JUDGE VANASKIE: All right. Well, I will ask that
17 question, then, of Mr. Slater.

18 Can you answer that?

19 MR. SLATER: We have people -- obviously Your Honor
20 knows we have people who are helping us to interpret the
21 Chinese-language documents.

22 To my knowledge, we have not translated any
23 English-language documents into Mandarin, as there was no need
24 to do so. We've never done so as to my knowledge. I've never
25 seen such a translation that I can think of.

1 We have people who go through the documents and help
2 us to understand what the Chinese language means so that we
3 can ask questions about it, but that's -- but what they're
4 asking is completely different than what we've done. It's not
5 something we've contemplated.

6 MR. GOLDBERG: Of course. And those translators who
7 are translating Mandarin to English can be used to translate
8 English to Mandarin. That's what they do. And there's no
9 reason plaintiffs cannot start to do that for these
10 depositions.

11 JUDGE VANASKIE: I'm not going to order it at this
12 time, Mr. Goldberg. I'm going to listen to the arguments next
13 Wednesday and make my determination then.

14 Plaintiffs are on notice that if I require that the
15 documents be translated from English to Mandarin, that they're
16 going to be required to do it in a hurry. And that if they
17 cannot be done in time for a deposition, then I may have to
18 postpone that deposition.

19 But they're on notice; they're going to make their
20 arguments. I don't know the extent of the problem. I'll get
21 a better sense of that next Wednesday.

22 All right. Anything else?

23 At the risk of that asking that question, anything
24 else?

25 My mom would say that's a snide remark, by the way.

1 We will adjourn for today, and we'll get together
2 again next week.

3 All right. Thank you all very much.

4 (3:50 p.m.)

5 - - - - -

6

7 I certify that the foregoing is a correct transcript
8 from the record of proceedings in the above-entitled matter.

9

10 /S/ Karen Friedlander, CRR, RMR
11 Court Reporter/Transcriber

12 4-1-21
13 Date

14

15

16

17

18

19

20

21

22

23

24

25

/	33:8	10:11	behalf [2] - 7:25	chosen [3] - 20:7, 29:12, 29:13
/S [1] - 33:10	absolute [1] - 18:16	answers [4] - 10:3, 11:5, 11:18, 20:11	benefit [1] - 10:15	circumstances [1] - 30:20
0	20:13	anyway [1] - 20:9	best [3] - 5:16, 7:2, 8:20	citation [1] - 18:5
07068 [1] - 1:13	abusive [1] - 9:16	apparent [1] - 10:25	better [3] - 15:22, 27:14, 32:21	citing [1] - 8:25
1	accept [1] - 5:8	applications [1] - 9:3	between [1] - 19:8	CIVIL [1] - 1:4
1 [2] - 1:7, 2:1 103 [1] - 1:12 17th [1] - 1:15 19103 [1] - 1:16 1:19-md-02875-RBK- KW [1] - 1:5	acceptable [1] - 9:23 accomplished [1] - 24:21 accuracy [6] - 14:2, 14:3, 14:6, 14:18, 14:19, 16:12 accurate [6] - 14:7, 16:3, 17:17, 17:25, 19:7, 21:4 acknowledged [1] - 12:14 ACTION [1] - 1:4 ADAM [1] - 1:12 address [6] - 18:9, 18:10, 18:21, 20:21, 21:11, 26:8 addressed [1] - 21:18 adequate [9] - 17:6, 18:18, 21:14, 21:16, 21:20, 21:25, 22:1, 22:2, 31:4 adjourn [1] - 33:1 ado [1] - 18:2 advance [3] - 11:16, 12:17, 16:17 adversarial [1] - 3:9 affects [1] - 6:5 affordable [1] - 16:9 afforded [1] - 30:19 aggravating [1] - 31:11 agree [1] - 24:4 agreement [1] - 22:10 ahead [5] - 2:2, 9:10, 14:24, 21:7, 28:7 aid [1] - 16:13 aided [1] - 1:23 akin [1] - 3:1 ALL [1] - 2:1 allocated [4] - 22:7, 22:9, 22:18, 22:21 allow [1] - 15:23 alone [2] - 2:20, 3:15 alter [1] - 10:2 altering [1] - 5:1 amount [1] - 20:10 AND [1] - 1:5 answer [18] - 3:23, 3:25, 4:25, 5:8, 6:4, 9:25, 10:3, 10:22, 10:25, 13:18, 14:21, 17:4, 20:11, 27:12, 31:12, 31:18 answering [2] - 3:21,	apply [1] - 25:24 appoint [5] - 18:15, 18:17, 18:18, 18:22, 20:20 appropriate [3] - 8:10, 10:20, 11:21 April [2] - 1:7, 2:1 arbitrary [1] - 27:10 areas [2] - 8:11, 19:1 argue [1] - 27:2 argued [1] - 18:8 arguing [1] - 18:1 argument [1] - 21:5 arguments [5] - 21:2, 26:12, 30:22, 32:12, 32:20 army [1] - 29:15 asserting [1] - 3:20 assertion [1] - 27:14 assessment [2] - 7:18, 18:22 Association [1] - 26:14 association [1] - 26:15 assume [1] - 29:20 assurance [1] - 26:4 assure [1] - 28:12 attack [1] - 9:18 attacked [1] - 9:20 attending [1] - 19:12 attorney [2] - 8:4, 22:6 availability [1] - 26:19 available [1] - 16:2 avoid [4] - 6:4, 6:21, 7:17, 11:20 avoiding [1] - 7:12 aware [1] - 3:1	big [1] - 21:1 bilingual [1] - 24:19 bit [2] - 24:3, 26:25 bite [1] - 12:1 board [1] - 17:22 book [1] - 26:21 breaks [1] - 22:13 breezy [1] - 7:16 brief [1] - 9:10 broke [1] - 7:13 brought [3] - 11:9, 19:21, 31:5 bulldog [1] - 10:24 bullying [1] - 9:16 burden [7] - 13:3, 16:16, 21:1, 23:2, 24:16, 24:22, 25:11 BY [2] - 1:12, 1:15	claims [1] - 8:4 clarify [1] - 4:23 cleanly [1] - 17:19 clear [3] - 9:19, 26:9, 27:5 clearly [1] - 18:13 client [2] - 6:3, 6:4 colleague [1] - 4:2 comfortable [1] - 8:9 coming [1] - 3:10 Commencing [1] - 1:8 comment [3] - 21:11, 21:17, 22:3 commentary [1] - 11:16 comments [6] - 5:9, 10:6, 10:9, 11:11, 11:12, 11:20 companies [1] - 7:6 company [2] - 7:25, 29:12
2	2 [1] - 4:6			compelling [1] - 30:2
20 [5] - 6:19, 8:18, 11:14, 11:15 2011 [1] - 11:2 2019 [1] - 15:10 2021 [2] - 1:7, 2:1 25 [1] - 5:23				completely [2] - 10:6, 32:4 complex [2] - 7:2, 8:18 complied [1] - 11:2 comply [2] - 11:3, 20:19 computer [1] - 1:23 computer-aided [1] - 1:23 concern [5] - 12:20, 14:18, 14:20, 24:11, 26:25 concerned [2] - 8:22, 20:23 conclude [1] - 30:13 concrete [1] - 27:18 conduct [4] - 2:11, 3:18, 4:11, 5:6 conference [1] - 25:19 CONFERENCE [1] - 1:6 confident [1] - 5:20 confirm [1] - 19:14 consequence [1] - 25:12 consideration [1] - 3:22 contact [1] - 4:4 contemplated [1] - 32:5
3			C	
30 [1] - 1:15 30(b)(6) [5] - 18:16, 18:18, 18:23, 21:15, 21:22 3:00 [7] - 1:8, 4:16, 4:17, 4:21, 6:6, 6:8, 6:11 3:01 [1] - 2:1 3:50 [1] - 33:4			Cancer [1] - 26:14 candidly [1] - 18:11 cannot [7] - 17:19, 22:17, 22:24, 29:9, 29:18, 32:9, 32:17 capable [1] - 7:23 case [5] - 2:16, 7:19, 9:3, 28:24, 31:14 cautioning [1] - 11:19 cents [1] - 16:15 certain [2] - 10:12, 26:20 certainly [2] - 10:20, 15:11 certify [1] - 33:7 challenging [1] - 14:2 check [2] - 14:4, 15:19 checker [2] - 17:23, 17:24 chemistry [1] - 14:1 chests [1] - 29:16 China [1] - 25:24 Chinese [10] - 2:18, 3:2, 3:5, 6:24, 13:9, 25:18, 29:7, 29:10, 31:21, 32:2 Chinese-language [2] - 6:24, 31:21 Chinese-speaking [1] - 25:18 chose [4] - 7:9, 18:15, 18:22	
4				
4-1-21 [1] - 33:12 45 [1] - 17:25				
7				
756-0160 [1] - 1:21				
8				
856 [1] - 1:21				
A				
a.m [6] - 4:16, 4:17, 4:21, 6:6, 6:8, 6:11 ability [2] - 27:2, 28:12 able [7] - 4:9, 19:24, 20:21, 25:7, 30:2, 30:5, 30:6 above-entitled [1] -		B baby [1] - 4:15 ballpark [1] - 25:2 based [3] - 11:1, 13:18, 28:14 basic [1] - 19:17 basis [4] - 3:20, 13:24, 22:11, 24:25 bear [2] - 22:17, 23:2 bears [1] - 13:3 beforehand [1] - 27:9 begging [1] - 6:2 begin [2] - 31:13, 31:15		

<p>context [7] - 12:11, 14:12, 14:17, 14:21, 25:9, 27:11, 27:15</p> <p>continue [1] - 6:7</p> <p>continued [1] - 4:10</p> <p>conversation [1] - 24:7</p> <p>cooperative [1] - 25:6</p> <p>core [2] - 7:19, 15:10</p> <p>corporate [2] - 7:9, 7:21</p> <p>correct [1] - 33:7</p> <p>correctly [1] - 26:12</p> <p>cost [7] - 16:11, 16:16, 22:7, 22:17, 24:3, 24:25, 29:16</p> <p>costs [1] - 16:15</p> <p>counsel [16] - 2:5, 2:24, 3:16, 6:1, 6:13, 7:14, 12:18, 12:25, 19:4, 19:12, 20:15, 25:7, 27:20, 28:2, 30:8</p> <p>country [1] - 22:8</p> <p>couple [3] - 18:10, 26:18, 26:22</p> <p>course [3] - 12:4, 13:25, 32:6</p> <p>COURT [1] - 1:2</p> <p>Court [3] - 1:20, 21:19, 33:10</p> <p>courts [1] - 2:17</p> <p>credibility [1] - 3:19</p> <p>CRR [1] - 33:10</p> <p>crucial [1] - 18:20</p> <p>cruising [1] - 11:15</p> <p>cutting [1] - 8:12</p>	<p>deponent [2] - 26:3</p> <p>depose [1] - 4:5</p> <p>deposed [2] - 2:18, 3:15</p> <p>deposition [28] - 2:4, 2:22, 3:2, 4:3, 6:7, 6:19, 8:17, 10:1, 10:19, 11:25, 12:18, 12:24, 13:3, 15:6, 15:7, 15:21, 16:18, 16:25, 19:2, 19:4, 19:12, 19:22, 21:2, 25:17, 28:11, 32:17, 32:18</p> <p>depositions [13] - 2:3, 2:12, 2:20, 4:10, 4:12, 5:6, 13:7, 15:8, 16:14, 23:7, 25:12, 29:7, 32:10</p> <p>derisive [1] - 20:17</p> <p>designate [4] - 7:22, 23:18, 23:20, 23:21</p> <p>designated [4] - 7:9, 7:20, 7:21, 21:21</p> <p>detail [1] - 29:25</p> <p>determination [2] - 24:16, 32:13</p> <p>determine [1] - 14:16</p> <p>difference [1] - 19:8</p> <p>different [3] - 29:10, 29:23, 32:4</p> <p>difficult [1] - 8:11</p> <p>direct [1] - 6:4</p> <p>directs [1] - 12:4</p> <p>disagreement [1] - 29:22</p> <p>disagrees [1] - 30:5</p> <p>disclose [3] - 12:17, 12:20, 12:25</p> <p>discovery [1] - 15:10</p> <p>discrimination [1] - 21:12</p> <p>discriminatory [3] - 21:11, 21:17, 22:2</p> <p>discuss [2] - 29:21, 29:25</p> <p>discussed [1] - 16:8</p> <p>DISTRICT [2] - 1:2, 1:2</p> <p>document [33] - 2:13, 4:16, 4:24, 6:16, 13:8, 13:11, 13:13, 13:16, 14:8, 14:11, 14:12, 14:15, 14:16, 14:17, 14:21, 15:16, 15:22, 15:24, 16:13, 16:24, 17:10, 17:16, 19:9, 19:10, 19:11, 19:13, 20:2, 20:16, 24:1, 25:8, 30:19, 30:25</p>	<p>documents [49] - 6:24, 8:13, 12:6, 12:19, 13:4, 13:25, 15:6, 15:8, 15:9, 15:11, 15:12, 15:21, 16:17, 16:21, 17:13, 17:18, 17:19, 17:20, 18:19, 18:23, 20:14, 20:22, 21:1, 22:5, 22:16, 22:25, 23:8, 23:9, 24:4, 24:9, 24:17, 25:4, 26:2, 26:23, 28:14, 28:16, 28:19, 28:21, 28:23, 29:4, 29:5, 30:15, 31:6, 31:14, 31:21, 31:23, 32:1, 32:15</p> <p>done [8] - 5:11, 5:20, 10:10, 18:24, 23:2, 31:24, 32:4, 32:17</p> <p>Dong [2] - 3:3, 23:5</p> <p>down [1] - 17:22</p> <p>DUANE [1] - 1:14</p> <p>during [5] - 13:2, 15:6, 22:13, 22:22, 29:3</p>	<p>enter [1] - 29:13</p> <p>entertained [1] - 11:23</p> <p>entertaining [1] - 11:22</p> <p>entire [5] - 5:23, 8:13, 13:16, 13:17, 27:7</p> <p>entirely [1] - 8:10</p> <p>entirety [1] - 2:5</p> <p>entitled [1] - 33:8</p> <p>equation [1] - 6:11</p> <p>equivalent [1] - 30:24</p> <p>error [1] - 13:20</p> <p>errors [1] - 17:17</p> <p>especially [1] - 25:13</p> <p>ESQUIRE [2] - 1:12, 1:15</p> <p>essentially [1] - 30:24</p> <p>establish [1] - 20:3</p> <p>estimate [1] - 25:2</p> <p>evaluation [1] - 7:12</p> <p>evasive [1] - 3:21</p> <p>event [1] - 26:17</p> <p>example [5] - 6:1, 18:20, 20:15, 24:25, 26:13</p> <p>examples [4] - 4:13, 6:1, 18:5, 27:19</p> <p>except [1] - 3:11</p> <p>excerpt [2] - 18:3, 18:4</p> <p>excerpts [2] - 2:3, 26:22</p> <p>exchange [3] - 12:24, 13:6, 22:5</p> <p>executives [1] - 7:5</p> <p>exemplary [1] - 9:6</p> <p>exhibit [2] - 19:10, 19:11</p> <p>exhibits [3] - 12:19, 12:24, 13:6</p> <p>expect [6] - 23:21, 23:24, 24:23, 25:6, 29:4, 30:5</p> <p>expecting [1] - 23:5</p> <p>expense [2] - 16:5, 26:2</p> <p>experience [2] - 3:6, 3:14</p> <p>experienced [1] - 3:24</p> <p>explain [2] - 3:8, 3:9</p> <p>explicit [1] - 5:7</p> <p>explicitly [1] - 12:14</p> <p>extensive [1] - 20:14</p> <p>extent [1] - 32:20</p> <p>extremely [2] - 22:21, 30:13</p>	<p>9:13, 11:13, 12:13, 19:24, 23:25</p> <p>fair [2] - 9:19, 30:8</p> <p>fairly [1] - 23:10</p> <p>fairness [1] - 24:20</p> <p>faith [1] - 25:6</p> <p>fall [1] - 20:22</p> <p>falling [1] - 30:3</p> <p>familiarity [2] - 23:22, 24:19</p> <p>far [2] - 7:1, 9:4</p> <p>FDA [1] - 18:21</p> <p>feasible [1] - 26:22</p> <p>federal [1] - 7:4</p> <p>few [5] - 4:13, 8:15, 16:15, 17:13, 22:13</p> <p>file [1] - 29:21</p> <p>fine [1] - 9:15</p> <p>finish [1] - 15:2</p> <p>firm [1] - 28:25</p> <p>first [11] - 2:11, 2:14, 4:6, 4:7, 5:13, 8:17, 10:17, 11:13, 13:22, 18:7, 21:10</p> <p>five [4] - 4:3, 22:10, 22:11, 22:13</p> <p>flavor [1] - 15:23</p> <p>focused [1] - 14:13</p> <p>follow [1] - 29:24</p> <p>following [3] - 8:14, 23:7, 28:18</p> <p>follows [1] - 27:13</p> <p>fool [1] - 18:25</p> <p>FOR [1] - 1:2</p> <p>force [1] - 10:1</p> <p>forced [2] - 14:21, 19:20</p> <p>foregoing [1] - 33:7</p> <p>foreign [1] - 20:18</p> <p>formed [1] - 3:23</p> <p>forward [2] - 24:15, 24:21</p> <p>foundation [5] - 17:8, 17:21, 24:11, 24:16, 31:4</p> <p>foundational [1] - 19:17</p> <p>four [2] - 3:4, 9:22</p> <p>frame [1] - 3:10</p> <p>frankly [2] - 5:3, 6:23</p> <p>FREEMAN [1] - 1:11</p> <p>Friedlander [2] - 1:20, 33:10</p> <p>friedlanderreporter@gmail.com [1] - 1:21</p> <p>full [1] - 18:4</p> <p>fully [1] - 18:8</p> <p>fulsome [2] - 17:15, 26:12</p>	
<p>D</p>		<p>E</p>	<p>e-mail [1] - 15:14</p> <p>easier [1] - 6:25</p> <p>easily [1] - 20:21</p> <p>economy [1] - 25:12</p> <p>editorial [3] - 5:9, 10:9, 11:20</p> <p>educating [1] - 7:23</p> <p>effect [1] - 11:1</p> <p>efficiency [1] - 16:14</p> <p>Eisenhower [1] - 1:12</p> <p>elsewhere [1] - 25:25</p> <p>employees [1] - 7:6</p> <p>encourage [2] - 6:3, 8:3</p> <p>end [2] - 11:14, 17:3</p> <p>endorse [1] - 21:19</p> <p>English [30] - 12:6, 12:7, 13:9, 13:10, 13:16, 13:17, 16:3, 16:22, 18:20, 20:1, 20:21, 21:14, 21:17, 21:20, 22:1, 22:2, 22:15, 22:17, 23:20, 23:22, 24:19, 25:1, 28:12, 30:14, 30:15, 31:23, 32:7, 32:8, 32:15</p> <p>English-language [1] - 31:23</p> <p>English-speaking [1] - 22:2</p>	<p>F</p>	
<p>Date [1] - 33:12</p> <p>date [1] - 28:23</p> <p>dealing [2] - 8:10, 30:17</p> <p>decide [2] - 13:2, 17:14</p> <p>decided [6] - 12:12, 12:13, 12:16, 13:5, 27:2, 27:4</p> <p>decision [1] - 31:4</p> <p>deem [1] - 9:18</p> <p>Defendant [1] - 1:16</p> <p>defendants [1] - 25:24</p> <p>defending [1] - 19:1</p> <p>defense [7] - 6:2, 6:20, 12:18, 17:11, 19:23, 25:22, 30:8</p> <p>Defense [1] - 1:16</p> <p>definitively [1] - 24:5</p> <p>delay [1] - 6:5</p>				<p>fact [7] - 7:8, 7:20,</p>	

future ^[1] - 11:20	12:3, 12:4, 12:9, 16:7, 16:19, 17:3, 18:3, 18:5, 20:9, 21:6, 21:10, 23:13, 26:9, 26:11, 28:9, 29:6, 29:20, 29:24, 29:25, 30:5, 30:6, 31:8, 31:10, 31:11, 31:19	interpreter ^[8] - 13:11, 13:15, 15:4, 15:15, 15:17, 15:19, 15:20 interpreter's ^[1] - 14:9 interpreters ^[6] - 13:22, 14:5, 22:11, 22:13, 28:25, 31:13 interpreting ^[1] - 22:15 interrupt ^[1] - 9:9 intervene ^[1] - 6:3 intimidate ^[2] - 4:21, 10:11 intimidating ^[1] - 9:16 intimidation ^[1] - 5:1 introduce ^[1] - 13:8 inviting ^[1] - 8:6 involved ^[1] - 24:17 IRBESARTAN ^[1] - 1:5 irrelevant ^[1] - 27:24 isolated ^[1] - 26:18 issue ^[12] - 2:13, 2:14, 5:13, 12:12, 12:15, 14:2, 14:3, 19:19, 20:9, 24:5, 26:12, 30:11 issues ^[3] - 2:11, 3:17, 18:10 itself ^[1] - 5:18	kinds ^[3] - 4:19, 10:6, 10:9 knowing ^[3] - 7:24, 14:7, 18:19 knowledge ^[5] - 11:2, 21:21, 26:19, 31:22, 31:24 knowledgeable ^[1] - 23:19 known ^[1] - 19:16 knows ^[3] - 4:14, 21:24, 31:20 Kugler ^[1] - 29:14	look ^[9] - 14:11, 14:15, 17:15, 17:23, 17:24, 19:2, 26:5, 27:21, 28:2 looking ^[3] - 9:1, 9:3, 26:2 LOSARTAN ^[1] - 1:4
G	HONORABLE ^[1] - 1:9 hope ^[2] - 18:14, 30:5 hopefully ^[1] - 25:18 hotel ^[3] - 2:20, 2:25, 3:15 hour ^[1] - 6:18 hours ^[4] - 22:10, 22:11, 22:13, 22:14 human ^[1] - 23:1 hundred ^[2] - 25:8, 26:21 hundred-plus ^[1] - 25:8 hundreds ^[4] - 25:4, 26:21, 26:23, 27:6 hurry ^[2] - 11:18, 32:16	J	L	M
game ^[1] - 23:3 gentleman ^[1] - 28:11 given ^[2] - 4:13, 22:12 God ^[1] - 11:10 GOLDBERG ^[15] - 1:15, 2:10, 2:24, 5:14, 9:12, 12:9, 14:25, 15:3, 16:7, 21:6, 21:8, 21:10, 28:10, 31:10, 32:6 Goldberg ^[13] - 2:2, 2:9, 9:11, 10:13, 12:8, 21:6, 21:9, 24:4, 25:16, 25:22, 28:7, 31:9, 32:12 Goldberg's ^[1] - 23:17 great ^[1] - 26:6 greater ^[1] - 27:11 Group ^[1] - 1:16 guarantee ^[1] - 28:22 guess ^[2] - 26:24, 27:16 guidance ^[1] - 12:3 guide ^[1] - 23:13	I	language ^[23] - 3:14, 6:24, 9:13, 14:22, 19:2, 19:15, 20:1, 20:18, 20:22, 21:23, 23:22, 24:2, 24:18, 24:19, 26:3, 29:9, 29:11, 30:18, 30:25, 31:6, 31:21, 31:23, 32:2 last ^[3] - 3:4, 4:4, 26:13 late ^[1] - 25:15 law ^[1] - 3:2 lawyer ^[2] - 6:2, 19:1 lawyers ^[1] - 6:10 layout ^[1] - 7:1 least ^[9] - 6:10, 13:23, 15:23, 16:12, 16:13, 25:16, 27:11, 28:20, 31:5 leave ^[2] - 6:12, 30:11 left ^[2] - 19:4, 22:6 lengthy ^[1] - 20:14 letter ^[4] - 2:11, 4:7, 5:17, 9:13 letters ^[1] - 2:3 Li ^[2] - 28:11, 28:17 li ^[1] - 28:18 LIABILITY ^[1] - 1:5 light ^[1] - 27:14 likely ^[1] - 24:12 limit ^[3] - 25:21, 25:23 limited ^[2] - 6:14, 22:9 listen ^[1] - 32:12 literally ^[1] - 6:2 litigation ^[8] - 3:6, 3:7, 3:14, 7:4, 7:11, 21:4, 29:3, 29:13 LITIGATION ^[1] - 1:5 LLC ^[1] - 1:11 LLP ^[1] - 1:14 located ^[2] - 25:24, 25:25 longest ^[1] - 9:24	Macau ^[3] - 4:18, 4:20, 6:12 machine ^[14] - 15:21, 16:1, 16:3, 16:9, 16:13, 16:17, 17:6, 17:9, 17:11, 17:19, 17:23, 22:25, 24:10, 24:14 machine-translated ^[3] - 15:21, 16:13, 17:9 mail ^[1] - 15:14 Mandarin ^[16] - 12:6, 13:9, 16:3, 16:20, 16:24, 22:16, 23:9, 24:17, 25:1, 25:23, 27:7, 31:23, 32:7, 32:8, 32:15 Mandarin-speaking ^[2] - 22:16, 23:9 marketplace ^[1] - 16:2 massive ^[2] - 8:12, 17:12 MASTER ^[1] - 1:9 matter ^[10] - 11:17, 11:23, 17:14, 20:19, 24:8, 24:20, 27:2, 27:4, 33:8 matters ^[1] - 26:20 MAZIE ^[1] - 1:11 mean ^[8] - 8:21, 9:15, 15:3, 25:21, 25:22, 25:23, 30:16, 31:3 means ^[1] - 32:2 mechanical ^[1] - 1:22 mentioned ^[1] - 11:13 message ^[1] - 11:17 might ^[2] - 18:14, 20:21 mind ^[3] - 11:9, 16:19, 28:5 Minli ^[1] - 4:3 minutes ^[6] - 6:19, 8:18, 11:14, 11:15, 18:1 miss ^[1] - 19:3 missed ^[1] - 19:6 mom ^[2] - 11:9, 32:25 Monday ^[6] - 5:22, 6:13, 12:10, 18:8	
H	IARC ^[1] - 26:13 ill ^[1] - 3:23 impeach ^[1] - 26:19 important ^[6] - 2:15, 6:10, 7:10, 8:11, 26:15, 27:18 impose ^[1] - 24:22 impugned ^[2] - 3:19, 5:25 impurities ^[2] - 7:12, 7:17 impurity ^[1] - 7:12 IN ^[1] - 1:4 inappropriate ^[3] - 5:21, 8:24, 10:7 included ^[1] - 9:13 including ^[1] - 7:5 indication ^[1] - 25:20 information ^[4] - 16:8, 16:10, 17:16, 20:4 insensitive ^[1] - 5:3 insist ^[2] - 4:16, 22:15 insisting ^[1] - 13:11 instruct ^[1] - 27:21 intended ^[7] - 4:21, 4:22, 5:10, 10:3, 10:4, 10:10 International ^[1] - 26:14 interpret ^[3] - 15:5, 15:20, 31:20	K		
half ^[1] - 6:18 hand ^[1] - 11:7 handful ^[2] - 16:22, 16:23 handling ^[1] - 7:24 handwriting ^[1] - 17:18 handwritten ^[1] - 17:18 hate ^[1] - 21:12 head ^[2] - 12:1, 16:8 hear ^[5] - 5:12, 8:6, 17:1, 24:11, 26:12 heard ^[5] - 2:6, 11:10, 29:13, 30:10 heart ^[1] - 5:21 help ^[2] - 11:15, 32:1 helping ^[1] - 31:20 highly ^[2] - 14:1, 28:14 Hilton ^[2] - 4:3, 8:25 himself ^[1] - 7:25 hold ^[2] - 7:13, 29:9 home ^[1] - 4:15 honest ^[1] - 18:14 Honor ^[40] - 2:10, 2:14, 2:15, 3:1, 4:4, 4:5, 4:7, 5:15, 5:21, 8:2, 8:5, 8:15, 9:12,	Karen ^[2] - 1:20, 33:10 KATZ ^[1] - 1:11 keep ^[1] - 8:25 key ^[1] - 15:12 kind ^[8] - 4:21, 5:1, 5:6, 9:5, 11:16, 21:17, 26:1, 28:3			

<p>20:17, 24:7 money [1] - 28:23 monograph [5] - 26:13, 26:17, 27:5, 27:7, 27:23 month [1] - 4:15 morning [1] - 4:6 MORRIS [1] - 1:14 most [6] - 3:24, 7:3, 7:10, 19:16, 21:21, 23:19 motion [2] - 5:22, 8:15 move [4] - 5:8, 8:16, 8:19, 29:6 moved [1] - 5:24 movies [2] - 3:7, 3:11 MR [29] - 2:10, 2:24, 5:14, 5:15, 7:17, 9:12, 12:3, 12:9, 14:25, 15:3, 16:7, 17:3, 17:6, 18:7, 18:13, 21:6, 21:8, 21:10, 23:12, 26:9, 26:17, 27:16, 28:8, 28:10, 29:20, 31:8, 31:10, 31:19, 32:6 must [1] - 7:15</p>	<p>nobody [2] - 8:3, 11:22 nothing [4] - 3:1, 18:2, 19:18, 31:8 notice [3] - 21:22, 32:14, 32:19 November [1] - 15:11 NUMBER [1] - 1:4 number [5] - 17:12, 18:15, 22:20, 25:2, 28:13 numerous [1] - 3:19</p>	<p>27:23 pandemic [1] - 22:22 papers [1] - 29:21 paragraph [3] - 13:16, 27:12, 27:13 paraphrase [1] - 11:4 Parkway [1] - 1:12 part [6] - 7:11, 11:4, 13:9, 25:9, 25:10, 28:1 particular [2] - 24:8, 30:11 parties [7] - 5:2, 12:23, 13:21, 13:23, 14:4, 22:10, 22:20 PARTIES [1] - 2:1 parts [6] - 2:5, 8:13, 10:14, 11:8, 18:21, 26:24 party [3] - 2:12, 16:19, 16:23 pass [1] - 25:21 past [2] - 22:19, 22:20 pay [1] - 29:16 paying [1] - 15:6 penalty [1] - 11:19 Peng [1] - 23:5 Pennsylvania [1] - 1:16 people [5] - 23:22, 25:13, 31:19, 31:20, 32:1 per [4] - 16:15, 22:9, 22:12, 24:25 per-page [1] - 24:25 permitted [1] - 4:10 person [3] - 9:6, 10:18, 23:18 personal [1] - 9:18 personality [1] - 11:8 perspective [1] - 25:2 persuade [1] - 30:6 pharmaceutical [1] - 7:6 Philadelphia [1] - 1:16 picked [1] - 19:1 plaintiffs [18] - 4:7, 15:4, 15:7, 15:18, 16:9, 16:16, 22:15, 22:17, 22:18, 22:24, 23:8, 28:15, 29:12, 29:15, 31:8, 31:12, 32:9, 32:14 Plaintiffs [1] - 1:13 plaintiffs' [3] - 10:18, 12:25, 25:1 plenty [2] - 15:12, 23:7 plucked [1] - 14:13 plucked-out [1] -</p>	<p>14:13 plus [1] - 25:8 point [8] - 10:20, 12:22, 19:11, 20:15, 23:15, 23:17, 27:25, 28:2 pointing [1] - 28:3 points [1] - 6:1 pong [6] - 3:3, 3:5, 3:19, 3:20, 3:22, 4:5 pong's [1] - 28:13 pops [1] - 12:1 portion [3] - 13:10, 27:22, 28:20 position [2] - 29:21, 30:24 possible [1] - 9:25 possibly [1] - 9:24 postpone [1] - 32:18 practical [1] - 20:20 practice [2] - 5:23, 30:17 precedes [1] - 27:13 preclude [1] - 10:17 precluded [3] - 4:12, 5:5, 10:8 precluding [1] - 11:24 predeposition [2] - 13:5, 22:5 preferable [1] - 24:9 prejudice [1] - 23:10 prejudicial [1] - 13:21 prejudicing [1] - 5:2 prepare [1] - 29:25 prepared [1] - 29:15 present [4] - 2:25, 3:16, 24:13, 29:24 presentation [1] - 30:3 presented [4] - 10:15, 16:20, 28:13, 30:22 pretty [1] - 30:17 previewing [1] - 26:25 previously [1] - 12:16 problem [7] - 8:8, 14:6, 14:23, 15:1, 15:3, 23:21, 32:20 proceed [1] - 2:9 proceedings [1] - 33:8 Proceedings [1] - 1:22 process [4] - 3:8, 7:3, 7:18, 14:1 produced [3] - 1:23, 15:10, 15:11 product [5] - 7:18, 12:21, 13:1, 16:5, 22:6 production [1] - 17:20 PRODUCTS [1] - 1:5</p>	<p>products [1] - 16:4 professional [1] - 11:21 profiles [1] - 7:12 proper [1] - 24:15 properly [1] - 3:25 protocol [1] - 12:23 provide [6] - 10:4, 10:5, 17:22, 24:24, 27:8, 27:11 provided [2] - 8:16, 21:15 provision [1] - 12:23 purposes [1] - 16:13 push [2] - 6:19, 8:3 put [10] - 5:16, 7:9, 12:10, 12:22, 24:17, 25:1, 26:2, 26:5, 27:14, 31:3 puts [1] - 27:15 putting [3] - 9:6, 19:9, 25:11</p>
<p>N</p>	<p>O</p>	<p>P</p>	<p>Q</p>	<p>R</p>
<p>named [1] - 28:11 narrower [1] - 30:7 nationals [1] - 3:5 nature [2] - 3:9, 7:4 necessary [1] - 30:4 need [15] - 11:22, 12:2, 16:20, 16:24, 23:6, 23:12, 24:3, 25:7, 25:8, 26:8, 26:11, 27:16, 31:4, 31:23 needed [1] - 29:14 needs [6] - 7:23, 10:5, 11:16, 21:18, 24:21, 30:23 never [7] - 2:17, 3:15, 6:17, 7:4, 7:7, 31:24 NEW [1] - 1:2 new [1] - 7:7 New [1] - 1:13 next [18] - 5:9, 6:20, 16:21, 19:19, 23:5, 23:7, 25:18, 25:19, 26:6, 27:17, 29:21, 30:1, 30:12, 31:2, 32:12, 32:21, 33:2 night [5] - 4:6, 22:10, 22:12, 22:14, 26:13 nights [4] - 3:4, 4:3, 9:22, 22:20</p>	<p>objected [1] - 20:7 objection [1] - 17:8 objections [2] - 17:21, 24:12 obligation [1] - 23:19 obligations [2] - 8:1, 30:6 obviously [9] - 7:22, 8:1, 8:22, 18:8, 18:9, 25:15, 29:22, 29:23, 31:19 OF [1] - 1:2 Official [1] - 1:20 old [1] - 4:15 once [3] - 4:4, 6:17, 24:5 one [14] - 4:15, 4:18, 4:19, 6:1, 8:19, 15:14, 18:5, 18:15, 19:19, 23:22, 23:23, 27:12, 27:13, 27:14 one-month-old [1] - 4:15 open [4] - 7:15, 7:16, 22:6, 28:5 opportunity [4] - 2:6, 30:16, 30:18, 30:19 order [6] - 5:7, 9:25, 10:7, 10:8, 20:25, 32:11 origin [1] - 21:23 outline [1] - 8:12 overall [1] - 7:1 owes [1] - 31:11 own [1] - 28:2</p>	<p>p.m [3] - 1:8, 2:1, 33:4 page [5] - 16:15, 24:25, 25:5, 25:8, 27:8 pages [8] - 14:11, 25:2, 25:5, 26:21, 26:23, 27:6, 27:8,</p>	<p>Qiangming [1] - 28:11 quarantine [1] - 2:19 questioned [3] - 24:18, 25:5, 31:1 questioner [1] - 9:6 questioning [1] - 9:21 questions [7] - 3:21, 3:23, 11:5, 19:16, 24:14, 30:15, 32:3 quick [1] - 15:16 quite [1] - 5:2</p>	<p>race [1] - 21:23 raised [3] - 2:10, 12:19, 18:9 rather [3] - 3:12, 3:16, 19:23 ratings [1] - 16:4 RE [1] - 1:4 read [13] - 2:3, 2:4, 2:5, 10:14, 11:8, 14:8, 16:22, 17:18, 18:23, 22:17, 24:1, 28:12 reading [3] - 19:2, 19:6, 20:2 reads [2] - 20:18, 23:20 reality [1] - 20:20 realize [1] - 25:4 really [5] - 2:17, 3:10, 3:22, 6:24, 8:2 reasked [1] - 19:5</p>

reason [6] - 15:18, 15:20, 28:21, 29:4, 29:17, 32:9 reasons [2] - 20:12, 20:24 receive [1] - 24:23 received [1] - 4:7 recipe [1] - 17:21 record [9] - 9:15, 13:12, 15:4, 15:15, 15:17, 19:10, 20:3, 27:16, 33:8 recorded [1] - 1:22 reference [1] - 3:10 referenced [1] - 2:5 referred [1] - 12:11 refrain [2] - 10:9, 11:4 refusing [1] - 10:22 regardless [3] - 21:22, 21:23 relevant [2] - 25:9 relief [1] - 9:1 rely [1] - 14:9 remark [1] - 32:25 remind [2] - 6:15, 6:17 remote [1] - 25:14 rep [1] - 18:18 repeat [1] - 7:14 repeated [1] - 11:5 repeating [1] - 6:13 report [2] - 26:5, 26:6 Reporter [1] - 1:20 reporter [2] - 6:9, 7:14 Reporter/ Transcriber [1] - 33:10 representative [2] - 7:9, 7:21 represented [1] - 25:16 require [2] - 2:19, 32:14 required [1] - 32:16 requires [1] - 12:23 Research [1] - 26:14 resolved [2] - 24:5, 24:6 resources [1] - 29:15 respect [2] - 3:18, 28:6 respond [1] - 23:12 responding [1] - 18:4 response [2] - 5:16, 9:10 responsive [1] - 11:6 rest [3] - 11:10, 25:22, 27:21 retain [2] - 13:23, 23:1 retained [4] - 13:23, 15:5, 20:6, 22:11	reveal [1] - 22:5 review [2] - 30:16, 30:18 ripe [1] - 13:20 risk [4] - 7:18, 18:22, 31:10, 32:23 RMR [1] - 33:10 role [1] - 28:14 room [1] - 3:15 rooms [2] - 2:20, 2:25 Roseland [1] - 1:13 rough [1] - 2:4 roughly [1] - 22:14 ruled [4] - 12:21, 12:22, 18:8, 22:5 rules [3] - 8:15, 18:17, 20:19 ruling [1] - 20:25 run [4] - 22:19, 24:12	22:3 service [1] - 28:25 SETH [1] - 1:15 Seth [1] - 21:6 setting [1] - 2:15 sex [1] - 21:24 ship [1] - 23:4 short [1] - 15:14 shorten [1] - 10:2 shorter [1] - 11:18 show [2] - 8:23, 15:9 showing [1] - 22:24 shows [1] - 18:24 sic [1] - 3:3 side [3] - 10:18, 27:14, 29:14 sides [3] - 24:23, 25:20, 30:22 sight [7] - 13:12, 13:13, 13:17, 13:18, 13:24, 13:25, 14:19 significant [4] - 10:14, 16:11, 16:16, 29:22 simply [3] - 10:22, 29:10, 29:17 single [3] - 9:25, 17:9, 30:18 site [1] - 14:9 sitting [1] - 3:15 situation [2] - 3:13, 7:7 six [1] - 22:14 sky [1] - 30:3 Slater [27] - 3:17, 4:1, 4:5, 4:10, 4:14, 5:5, 5:7, 5:13, 9:14, 9:19, 9:23, 10:4, 10:7, 10:17, 10:24, 11:7, 12:11, 12:17, 13:8, 14:13, 17:2, 21:13, 24:11, 29:2, 29:19, 31:11, 31:17 SLATER [17] - 1:11, 1:12, 5:15, 7:17, 12:3, 17:3, 17:6, 18:7, 18:13, 23:12, 26:9, 26:17, 27:16, 28:8, 29:20, 31:8, 31:19 Slater's [3] - 2:11, 4:2, 21:11 small [3] - 16:22, 16:23, 27:23 snide [3] - 11:11, 11:12, 32:25 someone [1] - 18:18 sometimes [1] - 17:12 soon [1] - 4:5 sorry [4] - 3:3, 8:20, 15:2, 18:10	sorts [1] - 17:17 soul [1] - 11:10 speaking [5] - 18:13, 22:2, 22:16, 23:9, 25:18 speaks [3] - 5:18, 20:18, 23:20 SPECIAL [1] - 1:9 specific [3] - 13:15, 19:1 specifically [1] - 26:18 spend [2] - 15:5, 17:25 spent [2] - 8:18, 28:22 spoken [1] - 14:3 spot [1] - 14:2 spur [1] - 21:4 stage [1] - 23:3 stand [3] - 8:2, 20:25 standard [3] - 9:5, 29:10, 30:17 stands [1] - 9:14 stark [1] - 27:14 start [7] - 17:3, 28:16, 28:21, 29:5, 29:17, 29:18, 32:9 started [1] - 4:5 starting [1] - 29:5 state [1] - 11:2 statements [2] - 4:19, 4:21 STATES [1] - 1:2 STATUS [1] - 1:6 stay [5] - 4:15, 4:17, 4:20, 6:6, 29:6 stenography [1] - 1:22 still [3] - 20:5, 27:2, 30:8 stop [1] - 11:16 stopped [4] - 5:4, 5:6, 5:23, 19:4 Street [1] - 1:15 strike [2] - 5:22, 8:15 subject [1] - 17:14 submission [1] - 24:24 submissions [1] - 18:21 sue [1] - 29:12 suggested [2] - 20:20, 30:7 suggesting [1] - 27:6 supposed [2] - 11:3, 20:3 suspect [1] - 31:15	technical [3] - 14:1, 15:16, 28:14 technology [1] - 25:14 TELEPHONE [1] - 2:1 telephone [1] - 1:6 tendency [1] - 10:24 terms [4] - 13:3, 14:1, 22:4, 31:5 testify [2] - 3:3, 23:9 testifying [2] - 3:4, 7:25 testimony [9] - 4:8, 5:2, 10:2, 10:4, 18:24, 22:10, 22:12, 22:20, 23:5 THE [2] - 1:2, 1:9 the court [3] - 6:8, 10:7, 22:3 themselves [1] - 7:24 they've [5] - 7:6, 15:12, 20:7, 28:24, 29:13 thinks [1] - 9:14 third [2] - 14:25, 15:3 THOMAS [1] - 1:9 threat [1] - 6:22 threatening [1] - 6:13 three [3] - 7:10, 27:8, 27:23 throughout [2] - 11:5, 30:9 Thursday [1] - 1:7 time-limited [1] - 22:9 tired [2] - 18:11, 18:14 today [9] - 2:7, 5:17, 12:14, 22:6, 26:8, 27:3, 30:11, 31:7, 33:1 together [2] - 25:7, 33:1 tone [1] - 8:6 tongue [1] - 12:1 tonight [1] - 25:15 tonight's [1] - 23:4 took [3] - 5:21, 11:13, 11:15 top [2] - 3:17, 16:8 topic [4] - 7:10, 9:7, 18:20, 20:22 topics [3] - 7:24, 21:22, 21:24 towards [1] - 20:18 transcript [9] - 1:23, 2:4, 5:18, 8:2, 8:5, 8:23, 10:14, 11:9, 33:7 transcription [1] - 1:23 transition [1] - 20:6 translate [17] - 13:12,
S				
sacrificed [1] - 22:22 sailed [1] - 23:4 sanctions [1] - 11:19 satisfactory [1] - 4:1 satisfy [1] - 10:4 saw [2] - 8:16, 18:3 scanned [2] - 17:18, 17:20 scattered [1] - 18:11 scheduled [1] - 25:19 Schneider [8] - 12:12, 12:13, 12:20, 12:21, 20:25, 22:4, 24:6 scientific [1] - 26:20 screen [1] - 9:1 second [3] - 2:12, 14:20, 20:20 section [1] - 13:17 sections [2] - 6:15, 8:12 secured [1] - 31:13 see [7] - 3:11, 11:5, 17:13, 19:12, 20:10, 23:21, 28:15 seeing [2] - 26:4, 27:12 sending [1] - 11:17 sense [2] - 26:4, 32:21 sensitive [4] - 3:12, 23:25, 30:14, 30:21 sensitivity [2] - 3:17, 20:9 sentence [3] - 13:15, 14:13, 19:6 sentences [2] - 26:18, 26:22 serious [1] - 11:23 seriously [2] - 8:23,				
T				
team [1] - 25:22				

<p>13:17, 13:25, 15:12, 15:15, 19:24, 21:1, 22:25, 23:8, 25:8, 27:21, 28:1, 28:16, 28:21, 29:5, 31:13, 32:7</p> <p>translated ^[14] - 4:17, 6:16, 12:18, 15:21, 16:13, 16:17, 16:24, 17:9, 17:19, 19:21, 21:3, 24:10, 31:22, 32:15</p> <p>translating ^[6] - 13:3, 13:24, 14:3, 24:4, 28:23, 32:7</p> <p>translation ^[26] - 2:13, 12:5, 13:12, 13:19, 14:7, 14:9, 14:19, 15:22, 16:1, 16:3, 16:10, 17:6, 17:12, 17:23, 18:1, 19:25, 20:13, 21:3, 22:7, 23:1, 23:6, 24:10, 24:14, 29:16, 31:25</p> <p>translator ^[5] - 6:8, 19:21, 19:24, 20:6, 29:3</p> <p>translators ^[3] - 23:1, 28:25, 32:6</p> <p>travel ^[1] - 22:23</p> <p>traveled ^[1] - 22:8</p> <p>treated ^[1] - 29:8</p> <p>trial ^[1] - 19:11</p> <p>tried ^[2] - 3:8, 3:9</p> <p>trust ^[2] - 19:25, 20:5</p> <p>try ^[2] - 6:4, 18:25</p> <p>trying ^[6] - 4:18, 4:20, 6:15, 6:17, 10:1, 20:19</p> <p>turn ^[1] - 9:2</p> <p>two ^[9] - 2:10, 6:1, 7:10, 23:6, 23:21, 25:6, 27:8, 27:22, 31:14</p> <p>type ^[1] - 27:24</p> <p>types ^[1] - 8:4</p>	<p>29:8, 30:4</p> <p>unfairness ^[1] - 29:7</p> <p>unfortunately ^[1] - 10:23</p> <p>unique ^[3] - 2:16, 2:21, 3:12</p> <p>UNITED ^[1] - 1:2</p> <p>unprofessional ^[2] - 3:18, 4:11</p> <p>unquestionably ^[1] - 13:20</p> <p>up ^[12] - 5:13, 7:9, 7:13, 9:6, 9:25, 10:24, 11:18, 12:10, 17:21, 24:13, 28:1, 31:5</p>	<p>window ^[2] - 7:15, 7:16</p> <p>witness ^[58] - 3:13, 3:24, 4:14, 4:22, 5:1, 5:3, 5:10, 5:25, 7:8, 7:20, 7:21, 8:11, 9:2, 9:17, 9:20, 9:23, 10:1, 10:5, 10:10, 10:11, 10:21, 10:22, 11:17, 13:4, 13:10, 13:18, 14:6, 14:8, 14:10, 14:20, 15:9, 15:23, 18:16, 18:25, 19:20, 19:25, 20:5, 20:21, 21:13, 21:15, 21:19, 21:24, 21:25, 22:2, 23:25, 24:18, 25:5, 25:18, 28:18, 30:14, 30:16, 30:18</p> <p>witness's ^[3] - 10:2, 10:3, 22:19</p> <p>witnesses ^[24] - 2:12, 2:18, 2:25, 3:2, 3:5, 7:3, 7:5, 14:14, 16:20, 16:21, 16:24, 21:15, 21:21, 22:8, 22:12, 22:16, 22:21, 23:6, 23:9, 29:8, 29:10, 30:8, 30:24</p> <p>word ^[5] - 11:9, 11:11, 14:3, 19:3, 19:4</p> <p>words ^[3] - 9:18, 11:1, 17:13</p> <p>world ^[1] - 25:12</p> <p>writing ^[1] - 26:6</p> <p>written ^[5] - 13:8, 13:16, 13:17, 16:21, 31:1</p>
V		
	<p>VALSARTAN ^[1] - 1:4</p> <p>VANASKIE ^[28] - 1:9, 2:2, 2:23, 5:12, 7:13, 7:15, 9:9, 10:13, 12:5, 14:24, 15:2, 15:25, 17:1, 17:5, 18:6, 18:12, 21:7, 21:9, 23:11, 23:15, 26:16, 27:4, 28:5, 29:19, 30:10, 31:9, 31:16, 32:11</p> <p>vein ^[1] - 23:16</p> <p>verbal ^[1] - 26:6</p> <p>version ^[1] - 12:6</p> <p>versions ^[2] - 12:6, 12:18</p> <p>VIA ^[1] - 2:1</p> <p>Via ^[1] - 1:6</p> <p>video ^[2] - 5:18, 8:5</p> <p>videographer ^[1] - 6:9</p> <p>view ^[1] - 21:19</p> <p>viewpoints ^[1] - 29:23</p> <p>visa ^[3] - 6:14, 22:9, 22:19</p> <p>voice ^[1] - 8:6</p>	
W		
	<p>wants ^[3] - 6:20, 13:8, 13:10</p> <p>war ^[1] - 29:15</p> <p>Wednesday ^[9] - 25:18, 25:19, 26:7, 29:22, 30:1, 30:12, 31:2, 32:13, 32:21</p> <p>week ^[9] - 4:4, 10:16, 16:21, 23:5, 25:17, 27:17, 28:11, 31:5, 33:2</p> <p>week's ^[1] - 23:7</p> <p>whole ^[1] - 2:7</p>	
Y		
		<p>years ^[2] - 5:23, 31:14</p> <p>yesterday ^[1] - 29:14</p> <p>yourself ^[1] - 11:15</p>
Z		
		<p>Zhang ^[1] - 4:3</p> <p>ZHP ^[14] - 1:16, 2:12, 5:2, 7:11, 13:21, 13:23, 15:5, 15:6, 16:19, 16:23, 18:15, 19:16, 20:6, 28:14</p> <p>ZHP's ^[1] - 2:24</p> <p>ZHP-party ^[1] - 16:23</p> <p>Zoom ^[2] - 2:18, 2:22</p>
U		
<p>U.S ^[5] - 2:17, 3:6, 3:7, 3:14, 7:6</p> <p>unable ^[1] - 24:1</p> <p>unacceptable ^[1] - 10:6</p> <p>under ^[2] - 3:2, 30:20</p> <p>understood ^[1] - 23:15</p> <p>undue ^[1] - 24:22</p> <p>unfair ^[6] - 8:18, 19:18, 20:16, 22:21,</p>		